

LAW OFFICES
FIGLIULO & SILVERMAN
A PROFESSIONAL CORPORATION
TEN SOUTH LASALLE STREET
SUITE 3600
CHICAGO, ILLINOIS 60603

JAMES R. FIGLIULO
(312) 251-5262
jfigliulo@fslegal.com

TELEPHONE
(312) 251-4600

FACSIMILE
(312) 251-4610

WWW.FSLEGAL.COM

January 17, 2020

VIA ECF & EMAIL

The Honorable Paul A. Engelmayer
United States District Judge
United States District Court for the Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: *Thomas & Betts Corp., n/k/a/ ABB Installation Products, Inc. ("T&B") v. Trinity Meyer Utility Structures, LLC, f/k/a McKinley 2014 Acquisition, LLC ("Meyer") and Arcosa, Inc. ("Arcosa")* Case No. 1:19-cv-07829 (PAE)(JLC)

Dear Judge Engelmayer:

Yesterday, T&B filed a redacted copy of its Memorandum of Law in Support of Its Motion to Dismiss Defendant Trinity Meyer Utility Structure's Amended Counterclaim ("Memorandum of Law") (ECF Doc. No. 61) and timely served a non-redacted copy of the Memorandum of Law on opposing counsel by email. (See ECF Doc. No. 63). Although these redactions reflect the same confidential information that was previously redacted by Meyer in its Amended Counterclaim with this Court's permission (ECF Doc. Nos. 51, 54), it occurred to us that we may also need to seek the Court's permission for filing this Memorandum of Law. Per Your Honor's Individual Rules 4.B and 6.B, T&B submits herewith a non-redacted copy of its Memorandum of Law and a highlighted version of its non-redacted Memorandum of Law showing the redactions, and T&B filed this letter on ECF.

In addition, T&B also attached the e-filed version of Meyer's Amended Counterclaim as an exhibit to the Declaration of Peter A. Silverman. This exhibit contains redactions that were already approved by this Court (ECF Doc. No. 51). When T&B prepares the courtesy copies of the motion papers for submission, it will be sure to prepare non-redacted highlighted copies of all redacted documents pursuant to Your Honor's Individual Rule 3.E.

Thank you for Your Honor's attention to this matter.

Enclosures

cc: all counsel of record

Very truly yours,

/s/James R. Figliulo

The Court has reviewed the proposed redactions and grants plaintiff's motion, Dkt. 65, to file the Memorandum of Law in redacted form. Counsel should file the unredacted documents under seal in accordance with this district's procedures. SO ORDERED.


PAUL A. ENGELMAYER 1/21/2020
United States District Judge